TITLE 326 AIR POLLUTION CONTROL BOARD

#05-197 (APCB)

SUMMARY/RESPONSE TO COMMENTS RECEIVED AT THE FIRST PUBLIC HEARING

On August 2, 2006, the Air Pollution Control Board (board) conducted the first public hearing/board meeting concerning the development of amendments to 326 IAC 8-5-1 and new rules 326 IAC 8-5-6 and 326 IAC 8-5-7. Comments were made by the following party:

International Truck and Engine Corporation / Indiana Castings Corporation (ITEC/ICC)

Following is a summary of the comments received and IDEM's responses thereto:

Comment: By specifying 100 percent capture efficiency for foundry core making operations, the proposed rule causes two regulatory compliance standards to be applied for foundries: One for the foundry maximum available control technology, and one that is above the MACT standard due to the 100 percent capture efficiency specification. Consistency with the MACT standard should be considered in this rulemaking. (ITEC/ICC)

Response: Currently, new facilities with potential emissions of 25 tons of VOC per year or greater, which are not already subject to other regulations contained in 326 IAC 8, are required by 326 IAC 8-1-6 to reduce VOC emissions using the Best Available Control Technology (BACT). 326 IAC 8-5-6 of the proposed rule specifies the level of controls as consistently established in past and current BACT determinations for foundry core making operations. The U.S. Environmental Protection Agency (EPA) requires that new rules be no less stringent than existing rules for State Implementation Plan (SIP) approval purposes. In order to remain consistent with past and current BACT determinations performed under SIP approved 326 IAC 8-1-6, the proposed rule requires a 100 percent capture efficiency. IDEM is planning further discussion with representatives of the industry to discuss the 100 percent capture efficiency requirement contained in the proposed rule.

Comment: Achieving 100 percent capture efficiency is very expensive because it involves heating lines and incurs extra maintenance costs. Evaluations conducted by MACT tech engineering and consulting for Indianapolis Castings Corporation in 2004 for existing machines indicated that the cost of control is $25,000 per ton of emissions. Based on a quick economic analysis, the cost of control per ton of VOCs for the last 5 percent is twice to triple the cost of control for the first 95 percent of capture. (ITEC/ICC)

Response: IDEM has requested documentation of the costs of complying with the level of control required in 326 IAC 8-5-6 of the proposed rule. The control standards for the proposed rule are derived from past and current BACT determinations of foundry core making operations.

Establishing BACT involves a case-by-case determination and is based on the maximum reduction in emissions that is technically feasible while taking into account energy, environmental, and economic impacts. 100 percent capture efficiency has been consistently required under current and past BACT analyses for foundry core making operations, therefore it is an appropriate standard for the proposed rule. IDEM is planning further discussion with representatives of the industry to discuss the 100 percent capture efficiency requirement contained in the proposed rule.